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The Honorable Katherine M. Stolz
Hearing Date: May 9, 2003
ORAL ARGUMENT REQUESTED

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**SUPERIOR COURT OF WASHINGTON
FOR PIERCE COUNTY**

JOSEPH and DEBORAH A. KIRBY,

Plaintiffs,

vs.

CITY OF TACOMA, et al.,

Defendants.

No. 99-2-13911-4

MOTION OF *THE SEATTLE POST-INTELLIGENCER*, *THE SEATTLE TIMES*, THE ASSOCIATED PRESS, THE WASHINGTON NEWSPAPER PUBLISHERS ASSOCIATION AND THE WASHINGTON COALITION FOR OPEN GOVERNMENT TO INTERVENE, VACATE PROTECTIVE ORDER AND UNSEAL COURT RECORDS

I. RELIEF REQUESTED

The Seattle Post-Intelligencer, *The Seattle Times*, The Associated Press, The Washington Newspaper Publishers Association and The Washington Coalition for Open Government (collectively, "Movants") respectfully move pursuant to CR 24 to intervene in this action for the limited purpose of seeking to vacate a protective order that has been entered in this action and unseal records that have been filed under seal with the Court pursuant to the protective order.

II. STATEMENT OF FACTS

On April 26, 2003, Tacoma Police Chief David Brame shot his 35-year-old wife, Crystal, with his department-issued .45 caliber handgun and then committed suicide in a Gig Harbor parking lot. Crystal Brame died one week later. These events have called into question the management of the City of Tacoma and its police force, raising serious concerns about City

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1 Manager Ray Corpuz's hiring and promotion of Brame, as well as senior police management
2 such as Acting Police Chief (now removed) Catherine Woodard.

3 An outside investigation has begun into Brame's career and various criminal allegations
4 about him that have come to light since he shot his wife.¹

5 Corpuz, Brame, Woodard and others in the Tacoma police force chain of command are
6 named as defendants in this case. Upon information and belief, the Movants understand that this
7 case involves allegations by Mr. Kirby that Tacoma police management allowed Brame to
8 engage in misconduct without investigation and/or repercussions, while Mr. Kirby was unfairly
9 disciplined for his actions.

10 It is impossible to further describe the underlying facts because the entire case file is
11 sealed pursuant to a protective order, including the protective order itself. Even the Court's
12 decision on summary judgment is sealed. (A copy of the docket sheet is attached as Exhibit A.)
13 However, it is clear this case relates to matters of significant public interest, namely Tacoma city
14 management and that of its police force, all at issue due to the recent Brame shootings.

15 *The Seattle Post-Intelligencer*, Washington's oldest daily newspaper, serves the greater
16 Puget Sound region. *The Seattle Times* is the largest daily newspaper in Washington State. The
17 Associated Press is a not-for-profit cooperative, owned by 1,550 U.S. daily newspaper members,
18 providing news to their dailies and 5,000 radio and television stations across the country. The
19 Washington Newspaper Publishers Association is a service organization for community
20 newspaper publishers, readers and advertisers. The Washington Coalition for Open Government
21 is an independent, nonpartisan, non-profit organization, dedicated to promoting and defending
22 the public's right to know in matters of public interest and in the conduct of the public's
23 business.

24
25
26 ¹ See "Outside Investigation of Brame Case Starts Monday, May Take Weeks," Tacoma News Tribune, May 3,
2003.

1 The Movants and the public are entitled to examine the court records in this case, which
2 should not have been sealed.

3 III. STATEMENT OF ISSUES

- 4 1. Are Movants entitled to intervene in this action in order to seek the vacating of the
5 protective order entered by the Court and the unsealing of the records filed with the Court?
6 2. Should the protective order be vacated and the records be unsealed?

7 IV. EVIDENCE RELIED UPON

- 8 1. Docket Sheet

9 V. LEGAL AUTHORITY

10 The law is clear that judicial proceedings and court records are presumptively open to
11 public access and inspection. Because of this presumption, courts around the country routinely
12 grant motions by the press to intervene to seek the unsealing of judicial records. And, as shown
13 below, numerous courts have ordered that records be unsealed pursuant to the First Amendment,
14 the common law or statutory interpretation.

15 A. The Movants are Entitled to Intervene.

16 Under CR 24(a)(2), a movant may intervene by right when the movant claims an interest
17 relating to the property or transaction that is the subject of the action, the applicant is so situated
18 that disposition of the action may as a practical matter impair or impede the movant's ability to
19 protect that interest, and no existing party will adequately represent the interest. CR 24(a)(2). In
20 the alternative, Rule 24(b) allows a movant to intervene when the movant's claim and the main
21 action have a question of law or fact in common.

22 Motions by the press to intervene in a case for the limited purpose of contesting a
23 protective order have been granted by courts in Washington. *Cohen v. Everett City Council*, 85
24 Wn.2d 385, 386, 535 P.2d 801, 802 (1975) (noting that the *Everett Herald* had intervened to
25 contest closing of trial); *King v. Olympic Pipeline Co.*, 104 Wn. App. 338, 347, 371, 16 P.3d 45
26 (2001) (noting that the *Bellingham Herald* had intervened to oppose entry of a protective order).

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1 Moreover, courts around the country have found that the media may intervene either as of
2 right or permissively to challenge the sealing of court records. Courts have ruled that the press is
3 entitled to intervene even where procedural rules are unclear in their application. *See, e.g.*
4 *EEOC v. National Children's Center, Inc.*, 146 F.3d 1042, 1045 (D.C. Cir. 1998) ("despite the
5 lack of a clear fit with the literal terms of Rule 24(b), every circuit court that has considered the
6 question has come to the conclusion that nonparties may permissively intervene for the purpose
7 of challenging confidentiality orders"); *see also San Jose Mercury News, Inc. v. U.S. District*
8 *Court—Northern District (San Jose)*, 187 F.3d 1096, 1100-01 (9th Cir. 1999) ("Nonparties
9 seeking access to a judicial record in a civil case may do so by seeking permissive intervention
10 ..."); *Rushford v. The New Yorker Magazine, Inc.*, 846 F.2d 249, 252 (4th Cir. 1988) (granting
11 motion of *The Washington Post*); *In re Enron Corp. Securities Litigation*, Civil Action No. 01-
12 3624, *slip op.* at 2 (S.D. Tex. Dec. 19, 2002) (granting press motion to intervene as of right);
13 *Greater Miami Baseball Club Ltd. Partnership v. Selig*, 955 F. Supp. 37, 40 (S.D.N.Y. 1997)
14 (granting motion of *The New York Times*); *In re Coordinated Pretrial Proceedings in Petroleum*
15 *Products Antitrust Litigation*, 101 F.R.D. 34, 37 (C.D. Cal. 1984) (granting motion of *The Wall*
16 *Street Journal*). *Cf. Seattle Times Co. v. Ishikawa*, 97 Wn.2d 30, 34, 640 P.2d 716, 719 (1982)
17 (granting mandamus actions brought by *The Seattle Times* and *The Seattle Post-Intelligencer* to
18 unseal records and open pretrial hearing); *Cohen v. Everett City Council*, 85 Wn.2d 385, 386-87,
19 535 P.2d 801, 802 (1975) ("It is recognized generally that the right of the media to observe and
20 report judicial proceedings is not a special privilege but rather is equivalent to the right of to [sic]
21 public in general to have open access to public trials.").

22 Accordingly, the motion of the Movants to intervene under CR 24 should be granted.

23 **B. The Protective Order Should be Vacated; Movants are Entitled to Access to**
24 **the Sealed Records.**

25 **1. Secret Justice Cannot be Countenanced.**

26 This lawsuit involves secret justice in a case of significant public interest. The Court has
allowed the court file to be withheld from public view in violation of the First Amendment.

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1 "The operations of courts and the judicial conduct of judges are matters of utmost public
2 concern." *Landmark Communications, Inc. v. Virginia*, 435 U.S. 829, 839, 98 S. Ct. 1535, 1541,
3 56 L.Ed.2d 1 (1978). As a threshold matter, the public interest in open courts requires correction
4 of this Star Chamber proceeding.

5 "Prior restraints upon speech and publication are the most serious and least tolerable
6 infringement on First Amendment rights." *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539, 559,
7 96 S. Ct. 2791, 2803 (1976). By keeping the sealed documents from becoming matters of public
8 record, the Court has engaged in unreviewable administrative censorship and has created an
9 impermissible "prior restraint." *Rhinehart v. Seattle Times Co.*, 98 Wn.2d 226, 230, 654 P.2d
10 673 (1982), *aff'd*, 467 U.S. 20, 104 S. Ct. 2199, 81 L.Ed.2d 17 (1984). A prior restraint comes to
11 a court "with a heavy presumption against its constitutional validity." *Bantum Books v. Sullivan*,
12 372 U.S. 58, 70, 83 S. Ct. 631, 639 (1963); *Matter of Providence Journal*, 820 F.2d 1342, 1348
13 (1st Cir. 1986), *modified on rehearing*, 820 F.2d 1354 (1st Cir.1987), *cert granted and dismissed*
14 *on other grounds*, 485 U.S. 693, 108 S. Ct. 1502 (1988).

15 The Court's Protective Order sealing the court files creates an unconstitutional prior
16 restraint because it directly forecloses Movants' right to obtain and disseminate (i.e., publish)
17 information filed with the court in this judicial proceeding.² This restriction on free speech
18 requires heightened First Amendment scrutiny far beyond any purported "good cause" basis for
19 protective orders. There is no basis in the record to meet this heightened security.

20 2. **The Protective Order violates the First Amendment because it denies**
21 **public access to civil judicial records.**

22 The United States Supreme Court has ruled that the "press and general public have a
23 Constitutional right of access to criminal trials" under the First and Fourteenth Amendments to
24 the U.S. Constitution. *Globe Newspaper Co. v. Superior Court for Norfolk County*, 457 U.S.

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26 ² See "Protective Discovery Orders and the First Amendment: The Limits of *Seattle Times* and the *Business Week*
Decision," 2 *Suffolk J. Trial & App. Advoc.* 63, pp. 73-74 (1997).

2 555, 100 S. Ct. 2814, 2816 (1980); *Associated Press v. U.S. District Court for Cent. Dist. of* 003 00022
3 *California*, 705 F.2d 1143, 1145 (9th Cir. 1983) (first amendment right of access to pretrial
4 documents).

5 Federal courts have also recognized a First Amendment right of access extending to civil
6 trials.³ In *Matter of Continental Illinois Securities Litigation*, 732 F.2d 1302, 1314 (7th Cir.
7 1984), the court recognized "the public's right of access guaranteed by the First Amendment, to
8 information before the court relating to matters of 'public interest.'" See also *Publicker*
9 *Industries, Inc. v. Cohen*, 733 F.2d 1059 (1984). This right is grounded in the public's interest in
10 the fair and open administration of justice and extends to pretrial proceedings and court
11 documents. See *Press Enterprise Co. v. Superior Court of California for Riverside County*, 478
12 U.S. 1, 12, 106 S. Ct. 2735, 2742 (1986); *Seattle Times Co. v. United States District Court*, 845
13 F.2d 1513, 1516 (9th Cir. 1988). The policy reason for granting public access in civil cases
14 relates to the public right to monitor the functioning of our courts, thereby insuring quality,
15 honesty and respect for our legal system. *Press-Enterprise Co.*, 464 U.S. at 508-09, 104 S. Ct. at
16 823-24; *Globe Newspaper Co.*, 457 U.S. at 606, 102 S. Ct. at 2620; *Continental Illinois*, 732
17 F.2d at 1309; *The Republic of the Philippines v. Westinghouse Electric Corp.*, 139 F.R.D. 50, 56
18 (D.N.J. 1991) ("The right of access to judicial records, like the openness of court proceedings,
19 serves to enhance the basic fairness of the proceedings and to safeguard the integrity of the fact-
20 finding process.").

21 Where, as here, the documents sealed were filed in connection with a dispositive motion
22 in a civil case, the rigorous First Amendment standard applies. *Rushford v. New Yorker*
23 *Magazine, Inc.*, 846 F.2d 249 (4th Cir. 1988). Both *Publicker, supra*, and *Rushford* require a
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25 _____
26 ³ Although the Supreme Court has not decided whether there is a public right of access to civil trials, Chief Justice
Burger noted "that historically both civil and criminal trials have been presumptively open." *Richmond Newspapers*,
100 S. Ct. at 2829 n.17.

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1 showing that the denial of access serves an important governmental interest and that there is no
 2 less restrictive way to serve that governmental interest. *Publicker*, 733 F.2d at 1071; *Rushford*,
 3 846 F.2d at 253. The court in *Rushford* laid out the procedural requirements courts should
 4 follow before allowing documents submitted in connection with a summary judgment motion to
 5 be filed under seal:

6 First, the District Court must give the public adequate notice that the
 7 sealing of documents may be ordered. Second, the District Court must provide
 8 interested persons 'an opportunity to object to the request before the Court makes
 9 its decision.' Third, if the District Court decides to close a hearing or seal
 documents, 'it must state its reasons on the record, supported by specific
 findings.' Finally, the Court must state its reasons for rejecting alternatives to
 closure.

10 846 F. 2d at 253-54.

11 Here, no compelling governmental interest exists to justify sealing court records—simply
 12 a desire to hide from public view potentially embarrassing information about public officers and
 13 the performance of their public duties.⁴

14 3. The Protective Order Violates the Washington Constitution and the
 15 common law.

16 Our state Constitution, Art. 1, § 10, expressly guarantees the public and the press a right
 17 of access to judicial proceedings and court documents in both civil and criminal cases. *Cohen v.*
 18 *Everett City Council*, 85 Wn.2d 385, 388, 535 P.2d 801 (1975). That provision of the
 19 Washington Constitution declares that "justice in all cases shall be administered openly...." This
 20 provision "entitles the public ...to openly administrated justice [and] . . . is not limited to trials
 21 but includes all judicial proceedings." *Federated Publications, Inc. v. Kurtz*, 94 Wn.2d 51, 59-
 22 60, 615 P. 2d 440 (1980) (internal quotations and citation omitted).

23 In addition to this clear constitutional mandate, Washington's common law imposes a
 24 stringent test—like that in *Rushford*—that courts must follow before closing records to the

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 26 ⁴ The Court of Appeals in *King v. Olympic Pipeline Co.*, 104 Wn. App. 338, 370, 16 P.3d 45 (2001), stated, "parties
 to a lawsuit are not the only people who have a legitimate interest in the record compiled in a legal proceeding"
 (citing *Citizens First Nat'l Bank of Princeton v. Cincinnati Ins. Co.*, 178 F. 3d 943 (7th Cir. 1999)).

1 public. See *Seattle Times Co. v. Ishikawa*, 97 Wn.2d 30, 37-79, 640 P.2d 716 (1982); *Allied*
2 *Daily Newspapers v. Eikenberry*, 121 Wn.2d 205, 210-11, 848 P.2d 1258 (1993).

3 Under *Ishikawa*, “[t]he proponent of closure and/or sealing must make some showing of
4 the need therefor.” 97 Wn.2d at 37. This requires a showing of “serious and imminent threat to
5 any interest alleged to be in jeopardy. Second, “[anyone] present when the closure [and/or
6 sealing] motion is made must be given an opportunity to object to the [suggested restriction].”
7 *Id.* at 38. Third, “[t]he Court is next required to ‘analyze whether the requested method for
8 curtailing access would be both the least restrictive means available and effective in protecting
9 the interests threatened.’” *Id.* Fourth, “[t]he Court must weigh the competing interests of the
10 [party] and the public and consider the alternative methods suggested. Its consideration of these
11 issues should be articulated in its findings and conclusions, which should be as specific as
12 possible rather than conclusory.” *Id.* Finally, “[t]he closure order, if warranted, must be no
13 broader in its application or duration than necessary to serve its purpose.” *Id.*

14 There is no evidence that the Court applied any of the *Ishikawa* standards in this case.
15 Apparently, the protective order is nothing but the type of blanket protective order that is
16 anathema to our open system of justice.⁵

17 Under *Ishikawa*, the Court’s protective order must fail and the records must be unsealed.

18 **4. The Protective Order violates federal common law.**

19 In *Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 98 S. Ct. 1306, 55 L.Ed.2d 570
20 (1978), the Supreme Court recognized a federal common law right “to inspect and copy public
21 records and documents.” 435 U.S. at 597, 98 S. Ct. at 1306. Federal appellate courts have
22 uniformly concluded that this common law right extends to both criminal and civil cases.⁶ The
23

24 ⁵ Several courts and commentators have noted with increasing concern the expanded use of protective orders. See,
25 e.g. *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 788-89 (3^d Cir. 1994) (noting increasing use of confidentiality
26 orders within “current trend of judicial secrecy”); *Casual Gag Orders, Constitutional Farce*, *New York Times*, Oct. 7,
1995, S1 18 (criticizing the imposition of protective orders in litigation).

⁶ See, e.g., *Leucadia, Inc. v. Applied Extrusion Tech. Inc.*, 998 F.2d 157, 161 (3d Cir. 1993); *Smith v. United States*
District Court, 956 F.2d 647, 650 (7th Cir. 1992); *EEOC v. Erection Co.*, 900 F.2d 168, 169 (9th Cir. 1990); *FTC v.*
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1 Ninth Circuit has expressly held that the federal common law right of public access extends to
2 materials submitted in connection with motions for summary judgment in civil cases. *San Jose*
3 *Mercury News, Inc. v. U.S. District Court - Northern Dist. (San Jose)*, 187 F.3d 1096, 1102 (9th
4 Cir. 1999).

5 **5. The Protective Order violates CR 26.**

6 Under CR 26, a party is only entitled to a protective order "for good cause shown."
7 Blanket or umbrella protective orders such as the one entered here "are inherently subject to
8 challenge and modification, as the party resisting disclosure generally has not made a
9 particularized showing of good cause with respect to any individual document." *San Jose*
10 *Mercury News*, 187 F.3d at 1103; *see also In re Enron Corp. Securities Litigation, Civil Action*
11 *No. 01-3624, slip op. at 6-7 (S.D. Tex. Dec. 19, 2002)* (rejecting a blanket protective order and
12 requiring the parties "to move in good faith for a particularized protective order"); *Felling v.*
13 *Knight*, 2003 WL 61220 (S.D. Ind. 2003); *Selig*, 955 F. Supp. at 40; *Havens v. Metropolitan Life*
14 *Ins. Co.*, 1995 WL 234710, at 12 (S.D.N.Y. 1995) ("the good cause requirement acts as a
15 guardian of the public's right of access to discovery documents by requiring parties to make a
16 threshold showing before documents will be withheld from public view.").

17 To establish good cause, the party seeking the protective order must show "specific
18 prejudice or harm" *Beckman Industries, Inc. v. International Ins. Co.*, 966 F.2d 470, 476 (9th
19 Cir.), *cert. denied*, 506 U.S. 868 (1992); *see also Cipollone v. Liggett Group, Inc.*, 785 F.2d
20 1108, 1121 (3d Cir. 1986), *cert. denied*, 484 U.S. 976 (1987) ("Broad allegations of harm,
21 unsubstantiated by specific examples or articulated reasoning, do not satisfy the Rule 26(c)
22 test.").

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26 *Standard Financial Management*, 830 F.2d 404, 408 n.4 (1st Cir., 1987); *In re Continental Illinois Securities*
Litigation, 732 F.2d 1302, 1308 (7th Cir. 1984); *Brown & Williamson Tobacco Corp. v. FTC*, 710 F.2d 1165, 1179
(6th Cir. 1983).

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DATED this 7th day of May, 2003.

GRAHAM & DUNN PC

By Judith A. Endejan
Judith A. Endejan, WSBA# 11016
Email: jendejan@grahamdunn.com
Janis White, WSBA# 29158
Email: jwhite@grahamdunn.com
Attorneys for *The Seattle-Post-Intelligencer*, *The Seattle Times*, The Associated Press, Washington Newspaper Publishers Association and The Washington Coalition for Open Government

EXHIBIT A

Pierce County Superior Civil Criminal Case 99-2-13911-4

Pierce County Superior Court Civil Case 99-2-13911-4

Case Title: JOSEPH J KIRBY ET UX VS CITY OF TACOMA ET AL
Case Type: Miscellaneous Type 2
Access: Sealed
Track Assignment:
Jury Size:
Estimated Trial Length:
Dept Judge:
Case Status:
Resolution:
Completion:

Litigants

Name	Type	Status
KIRBY, JOSEPH J Attorneys for KIRBY, JOSEPH J JOHN L. MESSINA JEFFREY HOWARD SADLER	Plaintiff Type Atty for Plaintiff/Petitioner Atty for Plaintiff/Petitioner	ACTIV Bar Nun
KIRBY, DEBORAH A Attorney for KIRBY, DEBORAH A JOHN L. MESSINA	Plaintiff Type Atty for Plaintiff/Petitioner	ACTIV Bar Nur
CITY OF TACOMA Attorneys for CITY OF TACOMA SHELLEY MARIE KERSLAKE STEPHEN MICHAEL HANSEN	Defendant Type Atty for Defendant Atty for Defendant	ACTIV Bar Numb
CORPUZ, RAY Attorney for CORPUZ, RAY SHELLEY MARIE KERSLAKE	Defendant Type Atty for Defendant	DISMI: Bar Numbe
CORPUZ, JANE DOE Attorney for CORPUZ, JANE DOE SHELLEY MARIE KERSLAKE	Defendant Type Atty for Defendant	ACTIV Bar Numb
ARREOLA, PHILLIP Attorney for ARREOLA, PHILLIP SHELLEY MARIE KERSLAKE	Defendant Type Atty for Defendant	ACTIV Bar Numb
ARREOLA, JANE DOE Attorney for ARREOLA, JANE DOE SHELLEY MARIE KERSLAKE	Defendant Type Atty for Defendant	ACTIV Bar Numk
WOODARD, WILLIAM Attorney for WOODARD, WILLIAM SHELLEY MARIE KERSLAKE	Defendant Type Atty for Defendant	ACTIV Bar Numl
WOODARD, CATHERINE Attorney for WOODARD, CATHERINE SHELLEY MARIE KERSLAKE	Defendant Type Atty for Defendant	ACTIV Bar Nur

ROBERTS, RAYMOND		Defendant	ACTIV
Attorney for ROBERTS, RAYMOND	Type		Bar Num1
<u>SHELLEY MARIE KERSLAKE</u>	Atty for Defendant		
ROBERTS, JANE DOE		Defendant	ACTIV
Attorney for ROBERTS, JANE DOE	Type		Bar Num1
<u>SHELLEY MARIE KERSLAKE</u>	Atty for Defendant		
BROME, DAVID		Defendant	ACTIV
Attorney for BROME, DAVID	Type		Bar Numbe
<u>SHELLEY MARIE KERSLAKE</u>	Atty for Defendant		
BROME, JANE DOE		Defendant	ACTIV
Attorney for BROME, JANE DOE	Type		Bar Numbe
<u>SHELLEY MARIE KERSLAKE</u>	Atty for Defendant		
HAIRSTON, JAMES		Defendant	ACTIV
Attorney for HAIRSTON, JAMES	Type		Bar Numb
<u>SHELLEY MARIE KERSLAKE</u>	Atty for Defendant		
HAIRSTON, JANE DOE		Defendant	ACTIV
Attorney for HAIRSTON, JANE DOE	Type		Bar Num
<u>SHELLEY MARIE KERSLAKE</u>	Atty for Defendant		
TACOMA POLICE MANAGEMENT ASSOCIATION		Intervenor	

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